

Koch, Kristine

From: Cora, Lori
Sent: Monday, November 23, 2015 5:05 PM
To: 'Carl Stivers'; Koch, Kristine
Cc: Patty Dost; ldunn@riddellwilliams.com; Amanda Shellenberger; Jen Woronets; Bob Wyatt; James McKenna; Allen, Elizabeth
Subject: RE: [External]RE: Draft Prioritization of Information Requests on FS Sections 3 and 4

Hello. Thank you Carl for providing your priority issues, it helps to assure that we resolve the most important questions and information the LWG has first.

EPA's goal tomorrow is to hopefully talk through and resolve all of the requests contained in your September letter, if possible. Toward that end, we would like to confirm that the following listed issues have been discussed between Carl (maybe other LWG members?) and Kristine and are resolved: #s 8, 11, 17, 18, 19, 20, 22, 28, 32, 38, and 39.

Also, in looking over other requests, there are several that have some simple yes/no answers that we can provide now to narrow down remaining requests that require discussion.

#1 – The 2014 EPA Tech Memorandum referenced was not further refined or updated. The cancer risk level of 10⁻³ was the criteria used for the “highly toxic” PTW criteria.

#4 – The text in the FS was inaccurate, EPA did not use a two-step process for applying technologies, no smoothing algorithm was used. The revised FS will correct the error.

#5 – Section 1 of the FS (Figures 1.2-20 and 1.2.21) identifies the groundwater plumes based on RI data and DEQ source control reports. The FS then assumes the plume extends from the bank to nav channel for purposes of costing GAC treatment.

#6 – EPA did not generate anything new on sheer stress, used LWG information.

#9 – EPA did not produce maps identifying both technologies and disposal requirements assumed for each area of identified PTW. Maps that show highly toxic and NAPL contours are Maps 3.2.1 – 3.

#13 – Thermal desorption treatment was obtained from a quote from the landfill operator for the cost estimate package. **Kristine can ask CDM for copy of the quote.**

#23 – For FS costing purposes, only beach mix was assumed for banks; however, the FS provides that vegetation may be appropriate as additional mitigation.

#25 – The information requested was not developed by EPA and is information EPA expects will be developed in design.

#31 – The references are from communications with and from Earl Hayter – will be included in the revised FS.

#33 – EPA intended to provide all residual risk figures. **EPA can provide in 1-2 weeks.**

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From: Carl Stivers [mailto:cstivers@anchorqea.com]
Sent: Monday, November 23, 2015 10:46 AM
To: Koch, Kristine <Koch.Kristine@epa.gov>
Cc: Patty Dost <pdost@pearllegalgroup.com>; ldunn@riddellwilliams.com; Amanda Shellenberger <ashellenberger@anchorqea.com>; Jen Woronets <jworonets@anchorqea.com>; Bob Wyatt <rjw@nwnatural.com>; James McKenna <jim.mckenna@verdantllc.com>; Cora, Lori <Cora.Lori@epa.gov>
Subject: RE: [External]RE: Draft Prioritization of Information Requests on FS Sections 3 and 4

Kristine – To help prepare for our November 24, 10:30 am conference call on FS Information Requests, below is a list of items that we would like to discuss for the next “wave” of information from EPA. The numbers and summary descriptions of these issues are consistent with our September 8, 2015 original request submittal (reattached here).

Information Needs

- 2 – Explanation of decision tree application outside intermediate areas
- 5 – Explanation of methods and results used to identify groundwater plume areas
- 9 – Maps of different types (as defined by EPA) of PTW
- 10 – Not reliably contained and ex-situ treatment determinations relative to NAPL, PAHs, and DDx
- 12 – Areas and volume of sediments with DDx detections assumed to be subject to the Oregon pesticide rule and related contained in decision point in the disposal decision tree.
- 14 – EPA methods for defining NAPL in Figures 3.3-28 and 29.
- 24 – Riverbank data (in Access or Excel format) used in FS riverbank evaluations
- 25 – Details of sheet piling approach used (e.g., areas enclosed, liner feet, assumed heights, types of sheet piles, evaluations of deep water sheet piling).
- 29 – Explanation of SEDCAM modeling methods and results presented at the July 31 roll out meeting
- 30 – Explanation of the import volume calculations and assumptions for back fill volumes in Table 3.6-3
- 33 – Any additional residual risk figures not presented in Appendix H
- 34 – Explanation of residual risk assessments performed at a “Site-wide scale”
- 36 – Explanation of methods and results of tissue concentrations calculated from SWAC estimates
- 37 – Explanation of data and CSM used to support the statements about the importance of bedload movement on p. 4-3
- 40 – Explanation of why some Section 4 dioxin/furan PRGs are different from the Section 2 PRGs, and which PRGs are correct.

Requests for Corrected Information

- 1 – Correct and consistent versions of Figures 3.3-27, 3.6-02 through 3.6-07, 4.2-11, and 4.2-14 through 4.2-17.
- 4 – Confirmation that dioxin/furan residual risk HQs are correct, and if not, supply the corrected information. Also, if correct, explain why the BHHRA and EPA draft FS HQs are often so different?

Thanks.

Carl

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